

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

MATTHEW R. LEIMBACH,

Plaintiff,

vs.

HAWAII PACIFIC HEALTH,  
WILCOX MEMORIAL HOSPITAL,  
KAUAI MEDICAL CLINIC,  
and DOES 1-50,

Defendants.

CIVIL NO. 14-00246 JMS-RLP  
(EMTALA)

**DECLARATION OF  
JAN M. VERNON**

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I, JAN M. VERNON, hereby declare under penalty of perjury:

1. I am an attorney with the law firm of Alston Hunt Floyd & Ing, and am one of the attorneys for Defendants Hawai'i Pacific Health; Wilcox Memorial Hospital and Kauai Medical Clinic (collectively, "HPH Defendants") in this action.

2. I make this Declaration based upon personal knowledge of the matters set forth herein. This Declaration is submitted in support of the attached *Defendants Hawai'i Pacific Health; Wilcox Memorial Hospital; and Kauai Medical Clinic's Memorandum in Opposition to [Dkt. No. 27] Plaintiff Matthew R. Leimbach's Motion for Pre-Motion Discovery*.

3. Attached hereto as Exhibit “A” is a true and accurate copy of Plaintiff’s Notice of Taking Deposition Upon Oral Examination of Defendant Hawai`i Pacific Health, pursuant to FRCP 30(b)(6) dated April 7, 2015.

4. Attached hereto as Exhibit “B” is a true and accurate copy of Plaintiff Matthew R. Leimbach's First Requests for Admissions to Defendants, Pursuant to FRCP 36 dated April 13, 2015

Executed in Honolulu, Hawai`i on April 23, 2015.

/s/ Jan M. Vernon  
JAN M. VERNON